

### REMARKS

Applicants are canceling pending Claims 19-28 without prejudice or disclaimer and adding new Claims 29-38. It is respectfully requested that these new claims be entered and allowed. No fee is believed due for these new claims. If a fee should be due for these new claims, please charge our deposit account 50/1039.

#### Claim Rejections - 35 USC §112

In the Office Action, the Examiner rejects Claims 19-28 under 35 USC §112, second paragraph as being indefinite. This rejection is respectfully traversed.

While Applicants traverse these rejections, in order to advance the prosecution of this application, Applicants are canceling pending Claims 19-28 and adding new Claims 29-38. It is respectfully submitted that the new claims overcome each of the Examiner's §112 objections to the claims. Accordingly, it is respectfully requested that this rejection be withdrawn.

#### Claim Rejections - 35 USC §102

The Examiner also rejects Claims 19-22 and 24-28 under 35 USC §102(b) as being anticipated by Hillman (US 6,059,888). This rejection is also respectfully traversed.

While Hillman is directed to a wafer scrubbing system, the Hillman system requires a pair of scrubbers holding a wafer therebetween and which is arranged to provide different frictional forces with the wafer, and thereby providing a torque on the wafer.

In contrast, while Applicants traverse this rejection, in order to advance the prosecution of this application, Claims 19-22 and 24-28 have been canceled, and new Claims 29-38 have been added. Accordingly, the claimed invention of Claims 29-38 is directed to a scrub cleaning

device wherein a substrate held between two scrubbers and conveyed by the rotation of the scrubbers rotates to perform the scrub cleaning by a friction force generated by an abutment on the guide member. Thus, the claimed invention is completely different than Hillman as the principal to drive the substrate of the claimed invention is different from that of the system in Hillman.

Further, in the claimed invention, a pair of scrubbers not only perform the scrub cleaning of the substrate but also convey the substrate. Hillman does not disclose or suggest such a structure or function.

Furthermore, in the claimed invention, the scrubbers have a planner-shape. In contrast, Hillman discloses bar-shaped scrubbers.

Therefore, it is respectfully submitted that Hillman is very different and does not disclose or suggest the claimed invention. Accordingly, the claims are patentable thereover, and it is respectfully requested that this rejection be withdrawn.

#### Claim Rejections - 35 USC §103

The Examiner also rejects Claim 23 under 35 USC §103(a) as being unpatentable over Hillman. This rejection is also respectfully traversed.

Similar to above, this claim has been cancelled and replaced with new claims. For reasons similar to those explained above, these dependent claims are also not disclosed or suggested by Hillman. Accordingly, it is respectfully requested that this rejection be withdrawn.

Conclusion

Therefore, it is respectfully submitted that the present application is now in a condition for allowance and should be allowed.


If any additional fee is due for this Amendment or the new claims, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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